

## REMARKS

### **Present Status of Application**

This is a continuation of U.S. Patent Application Serial No. 09/768,664. In the parent application, an Office Action (mailed May 20, 2003) indicated that claim 10 was allowable. In that application, Applicant made amendments to place the subject matter of claim 10 into condition for allowance, and canceled all remaining claims. Accordingly, claim 10 has been canceled in this continuation application. Claims 1-9 and 11-14 were substantively rejected under 35 U.S.C. § 103(a) and are pending in this application. Claims 15-23 are newly added.

### **Discussion of Office Action Rejections**

The Office Action of the parent application rejected claims 1-9 and 11-14 based principally upon the teachings of U.S. Patent 4,975,833 to Jinzaki. Specifically, the Office Action rejected independent claims 1 and 11 under 35 U.S.C. §103(a) as being unpatentable over Jinzaki in view of U.S. Patent 5,448,698 to Wilkes. Applicant respectfully disagrees with this rejection, and requests that the rejection be reconsidered and withdrawn.

With regard to independent claim 1, among other distinctions, independent claim 1 recites: “wherein the system is further configured to permit read access to a RAM by a plurality of the nodes in the system, but is further configured to limit write access to a RAM to only the node to which the RAM is connected.” (*Emphasis added.*) Similarly, independent claim 11 recites “each node containing a coherency mechanism configured to permit only read access to the RAM by other nodes, the coherency mechanism further configured to permit write access to the RAM only by functional units that are local to the node.”

*(Emphasis added.)* This claimed recitation clearly distinguishes claims 1 and 11 over the cited art, and for at least this reason the rejections are misplaced.

Unlike the invention of independent claims 1 and 11, the system of Jinzaki specifically teaches that remote processors have the ability to write to a non-local RAM (see col. 5, lines 56-63). As such, Jinzaki, alone or in combination with Wilkes, does not teach, suggest, or make obvious independent claims 1 and 11.

### **Newly-Added Claims 15-23**

Newly-added claims 15-23 have been added and patently define over the cited art of record in the parent application.

With regard to newly added claim 15, among other distinctions, independent claim 15 recites a plurality of RAMs configured as a unified RAM and a coherency mechanism configured to perform recited limitations. As such, Jinzaki, alone or in combination with Wilkes, does not teach, suggest, or make obvious independent claim 15.

With regard to newly added claim 19, among other distinctions, independent claim 19 recites a plurality of RAMs managed as a unified memory space and a memory controller configured to perform recited limitations. As such, Jinzaki, alone or in combination with Wilkes, does not teach, suggest, or make obvious independent claim 19.

With regard to newly added claim 20, among other distinctions, independent claim 20 recites four nodes comprising several elements and being connected through a communication link. As such, Jinzaki, alone or in combination with Wilkes, does not teach, suggest, or make obvious independent claim 20.

With regard to newly added claim 23, claim 23 defines a method for performing geometry accelerator computations in a distributed, nodal architectural environment, in

accordance with one embodiment of the invention. Among other distinctions, claim 23 defines a novel way in which geometry accelerator work queues are created and processed from messages originating at a device driver on a host. As such, Jinzaki, alone or in combination with the other cited art of record does not teach, suggest, or make obvious independent claim 23.

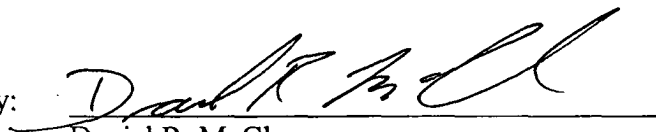
### CONCLUSION

In view of the foregoing, it is believed that all pending claims are in proper condition for allowance. If the Examiner believes that a telephone conference would expedite the examination of the above-identified patent application, the Examiner is invited to call the undersigned.

No fees, in addition to those noted on the accompanying transmittal documents, are believed to be due in connection with this Preliminary Amendment. If, however, any additional fee is believed to be due, you are hereby authorized to charge any such fee to Hewlett-Packard Company's deposit account No. 08-2025.

Respectfully submitted,

By:



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770-933-9500